

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE AND FEE CHANGES, 2000)

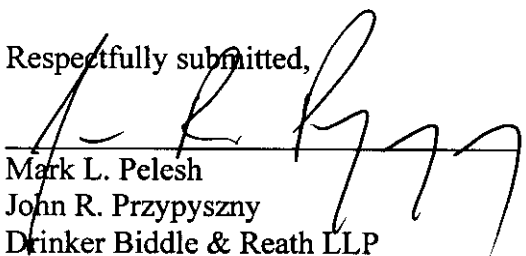
POSTAL RATE COMMISSION
Docket No. R2000-01 OF THE SECRETARY

**ASSOCIATION OF AMERICAN PUBLISHERS DESIGNATION OF WRITTEN
CROSS-EXAMINATION TO USPS WITNESS KINGSLEY (USPS-T-10)**

Pursuant to Section 30 of the Commission's Rules of Practice and Procedure and the Presiding Officer's Ruling Establishing Procedures for Receiving Institutional Responses dated April 17, 2000 (POIR No. 40), the Association of American Publishers (AAP), hereby designates the following responses from Postal Service witness Kingsley (USPS-T-10), which were provided after their oral testimony, as the written cross-examination of AAP:

AAP/USPS-T10-16

Respectfully submitted,



Mark L. Pelesh
John R. Przypyszny
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CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document, by First-Class Mail, upon the participants in this proceeding.

Date: May 4, 2000



John R. Przypyszny

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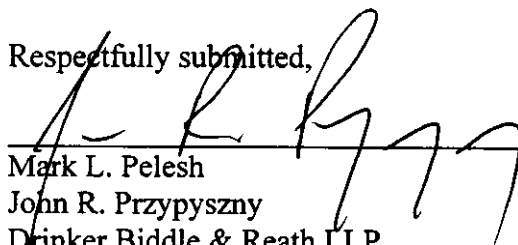
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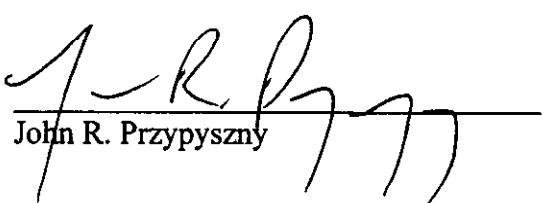
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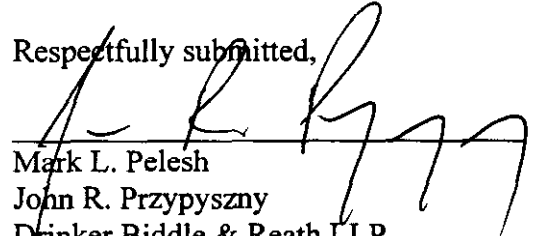
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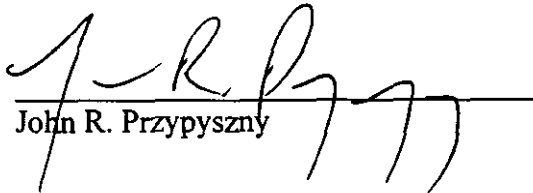


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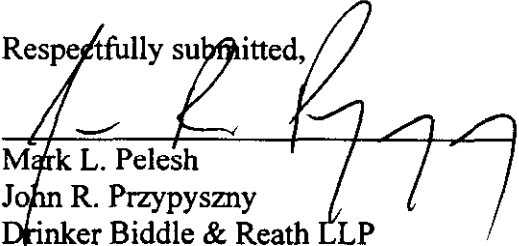
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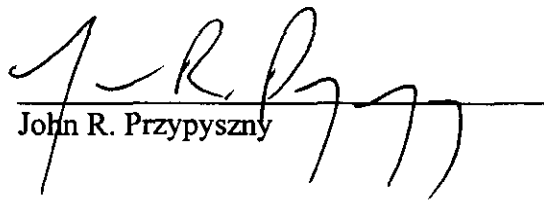
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John R. Przypyszny

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY
TO INTERROGATORIES OF ASSOCIATION OF AMERICAN PUBLISHERS**

AAP/USPS-T10-16 Please refer to your response to AAP/USPS-T10-14. In your response you state that Attachment H to the testimony of Postal Service witness Crum and that data supporting that attachment are "not the only evidence that proves this inefficiency of the outdated local entry." You also refer to information being provided on "numerous occasions" from customers that shows that they are depositing mail at facilities addressed to locations outside of that facility's service area. Please provide all documents which represent the "evidence" referred to by your response and which support the alleged inefficiency for BPM. For purposes of your response, you do not need to provide Attachment H of witness Crum's testimony or the Bound Printed Matter Study (USPS-LR-109) referred to in witness Crum's testimony.

Response:

As stated in AAP/USPS-T10-14, this information is often provided from customers directly to delivery units, so documents can not be provided in these cases. We have become aware of many of these situations from verbal complaints originating from delivery units that focus on the negative consequences related to local entry. Finally, during conversations with specific large mailers concerning their upcoming appointment activity, it has been clear that their entry profiles result in the previously stated inefficiencies. Moreover, these are not merely "alleged" inefficiencies, but rather are the virtually inevitable result of rational mailer behavior under the current, outdated requirements.